

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

SHIRLEY WILKINSON,)	
)	
Plaintiff,)	
)	
vs.)	No. 2019L 000338
)	
WAL-MART STORES, INC.)	
d/b/a Wal-Mart Super Center #1071)	
Serve:)	
C.T. Corporation Systems)	
208 South LaSalle Street, Ste 814)	
Chicago, IL 60604)	
)	
Defendant.)	

COMPLAINT

Comes now the Plaintiff, Shirley Wilkinson, by and through her attorneys, Mormino, Velloff & Snider, P.C., and for her cause of action against the Defendant, Wal-Mart Stores, Inc. d/b/a Wal-Mart Super Center #1071, states as follows:

1. That the Defendant, Wal-Mart Stores, Inc., is a Delaware corporation licensed to do business in the State of Illinois as a retail facility located at 610 Wesley Drive, Wood River, Madison County, Illinois.

2. That on or about March 17, 2017, at approximately 8:20 p.m., the Plaintiff was a patron at said establishment.

3. That while shopping at said establishment, an employee of the Defendant, pushing a rocker cart of merchandise, struck the Plaintiff with the cart causing her injuries.

4. That it was then and there the duty of the Defendant to exercise reasonable care for the safety of others.

5. That notwithstanding said duty, the Defendant, through the actions of its agents, servants and employees, committed one or more of the following negligent acts or omissions:

- a. Failed to keep a proper lookout while pushing rocker carts;
- b. Failed to warn patrons of the condition created by employees pushing rocker carts;
- c. Striking the Plaintiff with a rocker cart.

6. That as a direct and proximate result of one or more of the foregoing, the Plaintiff was injured, including injuries to her neck and back; that she has in the past and will in the future suffer pain of body and mind, incur medical bills in an attempt to be cured of the aforesaid, and lose sums of money that she would otherwise be able to make as an able-bodied person, all to her detriment in a sum in excess of \$50,000.

WHEREFORE, the Plaintiff, Shirley Wilkinson, prays judgment against the Defendant, Wal-Mart Stores, Inc. d/b/a Wal-Mart Super Center #1071, for a sum in excess of \$50,000, plus costs of suit.

Respectfully submitted,
"/s/" Samuel A. Mormino, Jr.
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WAL-MART SUPER CENTER #1071,)
)
Defendant.)

STATE OF ILLINOIS)
)SS
COUNTY OF MADISON)

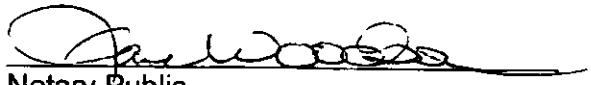
AFFIDAVIT

I, Samuel A. Mormino, Jr., being first duly sworn according to law under oath hereby states as follows:

1. That I am an attorney licensed to practice law in the State of Illinois.
2. That I am the representative of the Plaintiff in this cause, Shirley Wilkinson.
3. That pursuant to Supreme Court Rule 222, I affirmatively state that the total sum of money damages sought in all Counts of this claim is in excess of \$50,000.00.
4. That this Affidavit is made in good faith.


Samuel A. Mormino, Jr.

Subscribed and sworn to before me this 12th day of March, 2019.


Notary Public

